

**Federal Defenders
OF NEW YORK, INC.**

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January 19, 2022

Via ECF

The Honorable Jesse M. Furman
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Michael Avenatti*, 19 Cr. 374 (JMF)

Dear Judge Furman:

We write in response to the Court's request for suggestions or objections to the draft juror questionnaire (Dkt. 258). The defense respectfully makes the three following requests:

1. The defense requests that the Court omit reference to the Federal Defenders of New York in question # 23;
2. The defense requests the inclusion of Juliet Vicari in question # 23; and
3. The defense requests that the Court ask question # 51 from the written questionnaire: You may hear evidence in this case that the defendant, Michael Avenatti, was a practicing trial attorney who filed lawsuits against people and companies. Would that affect your ability to be a fair and impartial juror in this case?

Respectfully submitted,

/s/
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Cc: Counsel of record (via ECF)